

ANDREW M. KOHLMETZ, OSB #955418
The Law Office of Andrew M. Kohlmetz, LLC
741 SW Lincoln Street
Portland, OR 97201
Tel: (503) 265-8307
Email: andy@portlandfederaldefense.com

LAURIE BENDER, OSB #881570
Laurie Bender, P.C.
735 S.W. First Avenue, 2nd Floor
Portland, Oregon 97204
(503) 241-7075
Facsimile (503) 241-1768
lbenderlaw@aol.com

ATTORNEYS FOR JOSEPH DUANE FOLKERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,) Case No. 3:18-CR-00319-JO-07
))
Plaintiff,) DEFENDANT'S UNOPPOSED MOTION TO
)) RELEASE SEALED PLEADINGS AND
vs.) CONFIDENTIAL UNITED STATES
JOSEPH DUANE FOLKERTS,) PRETRIAL SERVICES REPORT AND
)) EXHIBITS TO COUNSEL FOR PURPOSES
Defendant.) OF DEFENDANT'S FRAP 9(a) APPEAL OF
)) DETENTION ORDER

COMES NOW Defendant, Joseph Duane Folkerts, by and through his CJA-appointed attorneys, Andrew M. Kohlmetz and Laurie Bender, and hereby moves this court for an Order releasing to said counsel and to counsel for the government: AUSA's Steven Mygrant, Leah Bolstad and Kelly Zusman, the following documents filed herein or relied upon by the Court in reaching its detention determination herein:

1. Government's Memorandum in Support of Pretrial Detention;

DEFENDANT'S UNOPPOSED MOTION TO RELEASE SEALED PLEADINGS AND CONFIDENTIAL
UNITED STATES PRETRIAL SERVICES REPORT AND EXHIBITS TO COUNSEL FOR PURPOSES OF
DEFENDANT'S FRAP 9(a) APPEAL OF DETENTION ORDER - 1

The Law Office of Andrew M. Kohlmetz, LLC
741 SW Lincoln Street
Portland, OR 97201
(503) 265-8307

2. Defendant's Motion for Review of Detention and Release on Pretrial Conditions Pursuant to 18 U.S.C. § 3142 and exhibits thereto; and
3. Pretrial Services Report on Defendant and exhibits thereto.

The proposed release of these sealed pleadings and confidential pretrial services report is for the limited purpose of litigating Defendant Folkerts' F.R.A.P. 9(a) appeal of this Court's Order detaining the defendant prior to trial (DR # 221).

Defendant requests that the court further Order that these documents, or any portion thereof, may be filed by counsel with the Ninth Circuit Court of Appeals as part of the record herein provided such filing is made pursuant to Circuit Rule 27-13(e).

The released documents will remain otherwise under seal and/or confidential for all other intents and purposes. Counsel for defendant/appellant and the government will not release, publish or cause to be published any portion of said documents nor provide a copy thereof to any person absent further order of this court.

RESPECTFULLY SUBMITTED this 20th day of September, 2019.

Andrew Kohlmetz
Andrew M. Kohlmetz, OSB 955418
Attorney for Defendant Folkerts

DEFENDANT'S UNOPPOSED MOTION TO RELEASE SEALED PLEADINGS AND CONFIDENTIAL
UNITED STATES PRETRIAL SERVICES REPORT AND EXHIBITS TO COUNSEL FOR PURPOSES OF
DEFENDANT'S FRAP 9(a) APPEAL OF DETENTION ORDER - 2

The Law Office of Andrew M. Kohlmetz, LLC
741 SW Lincoln Street
Portland, OR 97201
(503) 265-8307